

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL

MOTION FOR DISCLOSURE

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 JAN 10 PM 4:50
K6
50000

DATE: 1/8/07

Jimmie Lewis
SBI #506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

1.) THE DEFENDANTS JOHNSON, SAGERS, GRAY AND MOFFETT INTEND TO UTILIZE THE FOLLOWING PERSONS FOR PRE-TRIAL AND OR TRIAL PROCEDURES, THE DEFENDANTS

THEMSELVES, DR. SYLVIA FOSTER, DR. CHARLOTTE SELIG, NA MICHAEL ERICKSEN, KEN CREASEY, CHARGE NURSE - HELEN HANLON, UNIT DIRECTOR (MITCHELL) DIANE - STACHOWSKI, SW FLORENCE SCOTT COBB, SHIFT SUPER - DAVE SAXTON, NA CLARENCE OATES, CURTIS CORNISH, WILLIAM EVANS, PSYCHOLOGIST DR. KATHERINE SHENEMAN, NUTRITIONIST NANCY ANDERSON, SEE DEFENDANTS 11/30/06 RESPONSE TO DISCOVERY MOTION # IV, DE 87.

THEREFORE THE DEFENDANTS ARE REQUIRED TO PROVIDE ANY WRITTEN REPORTS PREPARED AND SIGNED BY THE WITNESSES, COMPLETE STATEMENTS OF THEIR ACCOUNT AS TO WHAT THEY INTEND TO EXPRESS TO THE COURT, EMPLOYEE TIME RECORDS DATING FROM 5/21/04 TO 6/25/04 FOR THE PURPOSE OF DETERMINING WHO IS QUALIFIED TO PRESENT FACTUAL TESTIMONY REGARDING THE CLAIMS OF THE PLAINTIFF'S COMPLAINT, AND FOR SUBPOENA.

2.) PROVIDE THE JUNE 20, 04 GRIEVANCE THAT STATES THE GRIEVANCE WAS CLOSED AS UNSUBSTANTIATED. SAID

DOCUMENT IS RELEVANT TO THE FACT FINDING UTILIZED TO FORMING DECISION REGARDING THE PLAINTIFFS CLAIMS AS WELL AS THE P.L.R.A

3.) PROVIDE THE EMPLOYEE TIME RECORDS ~~FOR DR. SANDHU, DR. OVRESHI,~~ D. LAURENCE, MARGRET WILSON, GLORIA BANKS, MARK DIGGS, KAREN CHAMBLIN, TONYA WILSON, ALICIA JAMES, PAT RILEY, DR SHETH, ROSE ARES, SETAL J, JAMES EVANS, WILLIAM EVANS, FOR THE PURPOSE OF DETERMINING WHO IS QUALIFIED TO PRESENT FACTUAL TESTIMONY REGARDING THE CLAIMS OF THE PLAINTIFFS COMPLAINT, AND FOR SUBPOENA; DATING FROM 5/21/04 THRU 6/25/04

4.) PROVIDE RONALD STEVEN'S CONTACT ADDRESS, A INMATE PATIENT THAT WAS AT THE D.P.C DURING THE PLAINTIFF'S STAY AT THE D.P.C FROM 5/21/04 THRU 6/25/04, AN WITNESSED ~~SEVERAL~~ MANY OF THE CLAIMS NOTED IN THE PLAINTIFFS COMPLAINT.

5.) PROVIDE JAMES SMITH ~~AND~~ CONTACT ADDRESS, A INMATE PATIENT THAT WAS AT THE D.P.C DURING THE PLAINTIFF'S STAY AT THE D.P.C FROM 5/21/04 THRU 6/25/04, AN WITNESS THE INCIDENT WITH MOFFETT, GRAY, SAGERS AND EVANS IN THE DINNING ROOM ON 6/14/04 AT OR ABOUT 9:00 PM.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS _____, DAY OF,
_____, 2007 THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE MOTION FOR DISCLOSURE,
BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

LOUIS J. RIZZO JR
1001 JEFFERSON PLAZA
SUITE 202
WILMINGTON, DELAWARE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
WILMINGTON, DELAWARE 19801

DATE:

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